

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION

GEORGE WELCH

PLAINTIFF

VS.

CIVIL ACTION NO.: 3:20-cv-00122-NBB-JMV

CITY OF HERNANDO, MISSISSIPPI,  
ET AL.

DEFENDANTS

PLAINTIFF'S AMENDED SUPPLEMENTAL RESPONSES TO DEFENDANTS' FIRST  
SET OF INTERROGATORIES

COMES NOW George Welch, by and through counsel of record, and supplements his responses to interrogatories propounded by Defendants to Plaintiff as follows:

INTERROGATORIES

INTERROGATORY NO. 2: Please identify by name, address, and telephone number each person known to you or your attorneys to have discoverable knowledge that would tend to support or refute any claim, defense, or element of damages in this action. With regard to each person identified, please specifically state any and all knowledge they are believed to have regarding this suit and provide a brief summary of the facts and circumstances of which said person is believed to have knowledge. This interrogatory is continuing in nature.

Response:

1. **George Welch**

[REDACTED]  
can be contacted through counsel for Plaintiff  
George Welch is the Plaintiff in this matter.

2. **Beverly Harris**

[REDACTED]  
Beverly Harris was Plaintiff's girlfriend at the time of the incident that is the subject of this action and saw the injuries firsthand.

3. **Harold Williams**

[REDACTED]

Beverly Harris was Plaintiff's girlfriend at the time of the incident that is the subject of this action and saw the injuries firsthand.

**3. Harold Williams**

[REDACTED]  
[REDACTED]

Harold Williams is an employee with Mercedes Benz of Collierville. Mr. Williams is aware of Mercedes Benz of Collierville terminating their work relationship with Plaintiff after discovering the incident that is the subject of this action.

**4. Joseph Harris**

Current address unknown

Current phone number unknown

Joseph Harris is a named Defendant in this action and was the initial officer that approached Plaintiff in the incident that is the subject of this action.

**5. Lieutenant Robert Scott**

Hernando Police Department; 2601 Elm St., Hernando, MS 38632

662-429-9096

Lieutenant Robert Scott is a named Defendant in this action and assisted Joseph Harris in the incident that is the subject of this action

**6. Officer Roger Swatzyna**

Hernando Police Department; 2601 Elm St., Hernando, MS 38632

662-429-9096

Officer Roger Swatzyna was a responding officer to the incident that is the subject of this action.

**7. Officer A. Lewis**

Hernando Police Department; 2601 Elm St., Hernando, MS 38632

662-429-9096

Officer A. Lewis was a responding officer to the incident that is the subject of this action.

**8. Officer Brian Bell**

Hernando Police department; 2601 Elm St., Hernando, MS 38632

662-429-9096

Officer Brian Bell encountered the Plaintiff the night prior to the incident that is the subject of this action.

**SUPPLEMENTAL RESPONSE:**

**1. Jasmine Welch**

[REDACTED]  
[REDACTED]

Jasmine Welch picked up Plaintiff from jail the on the day of the incident

**2. Chief Scott Worsham,**

Hernando Police department; 2601 Elm St., Hernando, MS 38632

662-429-9096

Chief Worsham is the Chief of Police for the Hernando Police Department

**3. Harold Williams**

Plaintiff would like to clarify that Harold Williams is an employee with Mercedes Benz of Collierville, of which Plaintiff had a contract with through his self-employment as a transporter. Mr. Williams is aware of Mercedes Benz of Collierville terminating the contract with Plaintiff after discovering the incident that is the subject of this action.

**INTERROGATORY NO. 4:** Please identify any person with whom Plaintiff has spoken or communicated in any way regarding the subject matter of this lawsuit, and for each person identify:

- (a) the person's name, position, address and telephone number;
- (b) the statement or statements allegedly made by Plaintiff, whether verbally or in writing or in any other form;
- (c) the date Plaintiff made any alleged statements; and
- (d) the name, address and telephone number of the person or persons having custody of any document, audiotape or videotape containing such statement(s) and describe each such document, audiotape or videotape.

**Response:**

**1. Beverly Harris**

- a. [REDACTED]
- b. [REDACTED]
- c. Plaintiff described the incident and the injuries he sustained from the incident that is the subject of this action
- d. Multiple dates
- e. None

**2. Harold Williams**

- a. [REDACTED]
- b. [REDACTED]
- c. Plaintiff the nature of the incident with Harold Williams on the day Mercedes Benz terminated their relationship with Plaintiff.

**SUPPLEMENTAL RESPONSE**

**3. Jasmine Welch**

- a. [REDACTED]
- b. Plaintiff described the incident on the day she picked him up from the jail.

4. **Harold Williams**

- a. [REDACTED]
- b. [REDACTED]
- c. Plaintiff wishes to clarify that he described the nature of the incident with Harold Williams on the day Mercedes Benz terminated the contract with Plaintiff.

**INTERROGATORY NO. 5:** Identify all documents and/or tangible things known by you to exist, and the location and custodian of each document, that tend to support or contradict the allegations made in the Amended Complaint.

**Response:** Plaintiff is still accumulating all medical records and will update these discovery responses once they receive them. Plaintiff has photographs of his injuries. Plaintiff asserts that the trial transcript is in the possession of the court reporter for the Honorable Allen Couch. Plaintiff asserts. that all other documents, i.e., dispatch transcripts, Affidavits, time logs, etc., are in Defendants possession.

**SUPPLEMENTAL RESPONSE:**

Plaintiff has no medical records. Plaintiff has photographs of his injuries. Plaintiff asserts that the trial transcript is in the possession of the court reporter for the Honorable Allen Couch. Plaintiff asserts. that all other documents, i.e., dispatch transcripts, Affidavits, time logs, etc., are in Defendants possession.

**INTERROGATORY NO. 6:** Describe in detail and with specificity any and all photographs, videotapes, audiotapes or other recordings, by whatever means produced, which you contend may be relevant to the claims in this case, including all photographs, tapes, or recordings of any agent, employee, or former agent or employee of Defendant in your possession or of which you have knowledge, including a description of the contents of such, the present location of such, the person(s) portrayed in such, the person(s) responsible for such, and the date(s) such were made.

**Response:**



- a. Photo of injuries to Plaintiff's back: photo speaks for itself
- b. Photo of injuries to Plaintiff's wrist: photo speaks for itself
- c. Photographs of Plaintiff's vehicle parked on the date of the incident: photo speaks for itself
- d. Photos of Trapper Drive: Photos show Trapper Drive and show that "No Parking" signs were not installed on the street

**SUPPLEMENTAL RESPONSE:**

- e. Dispatch recordings from Hernando Police Department on the day of the incident

**INTERROGATORY NO. 10:** Please state the name and address of each and every hospital, clinic, institution, medical doctor, osteopathic doctor, health care provider, psychologist, psychiatrist, physical therapist, counselor, and clergy member with whom or by which you were treated, examined, or counseled within ten (10) years immediately preceding the incident upon which your Amended Complaint is based for any physical or emotional injury or other physical or mental condition, and for each, please state:

- (a) name, address and telephone number;
- (b) the date or dates of each such treatment, examination or consultation; and
- (c) the reason or reasons for each such treatment, examination or consultation and the nature of the treatment, examination or consultation you received, and
- (d) identify all documents or records concerning such treatment and the individual(s) in possession of said documents.

**Response:** None

**SUPPLEMENTAL RESPONSE:**

Dr. Lloyd Robinson; OccuMed- 1785 Nonconnah Blvd, # 120, Memphis, TN 38132

**INTERROGATORY NO. 12:** Please state and itemize all medical expenses you allegedly incurred, including all hospital, drug, doctor, counseling or any other related medical bills, which you contend were necessitated as a result of the purported actions or inactions of the Defendants and identify all documents relating to such medical expenses.

**Response:** Plaintiff is still accumulating all medical records and will update these discovery responses once they are received.

**SUPPLEMENTAL RESPONSE:** NONE

**INTERROGATORY NO. 13:** Please list and identify all drugs or medications prescribed to and/or used by you during the last ten (10) years, including the name of the physician who prescribed each type of drug or medication, and the reason therefore, and the name and addresses of all pharmacies where your prescriptions were filled.

**Response:** Glimepiride Metformin: Diabetes Medication

**SUPPLEMENTAL RESPONSE:** Glimepiride Metformin: Diabetes Medication; prescribed by Dr. Llyod Robinson; Costco Pharmacy: 3775 Hacks Cross Rd, Memphis, Tn 38125.

**INTERROGATORY NO. 16:** Please provide your complete work history to date, including: (a) the name and address of each employer (ending with Plaintiff's current or most recent employer); (b) dates of employment; (c) title or position held and brief description of job responsibilities; (d) rate of pay (including salary, benefits, bonuses, perquisites, etc.); (e) reason for termination or separation from employment; and (f) name and position of supervisor(s).

**Response:**

1. X-Pert Tune- Technician
  - a. 1984-1992
  - b. \$12.00/hr
  - c. Reason for departure: New Job
2. FedEx- Handler
  - a. 1990-1991
  - b. Reason for departure: New job

3. United Parcel Service: Supervisor
  - a. 1992- 2015
  - b. \$7,500.00/month
  - c. Reason for departure: Retired
4. Self employed
  - a. 2016-Present

**SUPPLEMENAL RESPONSE:**

1. Self employed: Transporter, Geo Transportation
  - a. 2016- Present

**INTERROGATORY NO. 18:** Describe in detail your educational background, and include the names and addresses of all institutions that you have attended, the dates of attendance, and a description of the degrees or certificates that you have obtained.

**Response:**

1. Meridian High School: 1980-1983; High School Diploma
2. Nashville Auto Diesel College: 1983; Certificate

**SUPPLEMENTAL RESPONSE:**

1. Meridian High School: 1980-1983; 1401 Mounds Rd, Mounds IL 62964; High School Diploma
2. Nashville Auto Diesel College; currently known as Lincoln College of Technology; 1524 Gallatin Ave, Nashville, TN 37206; Certificate.

**REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST NO. 11:** Please produce a copy of your tax returns for the last five (5) years.

Response: See attached 2017 tax return. 2018 and 2019 tax returns will be supplemented upon completion. Plaintiff is still locating tax returns for 2015 and 2016.

**SUPPLEMENTAL RESPONSE:**

See returns for years 2015 and 2016 attached.

Respectfully submitted this the 28<sup>th</sup> day of April, 2021.

ATTORNEYS FOR PLAINTIFF

/s/ Garret T. Estes

John Keith Perry, Jr. (MSB#: 99909)

Garret T. Estes (MSB# 105517)

**PERRYGRIFFIN, P.C.**

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**CERTIFICATE OF SERVICE**

I certify that, on April 28, 2021, I have this day caused to be served via United States Mail, postage prepaid, a true and correct copy of the foregoing *Plaintiff's Amended Supplemental Responses to Defendants' Interrogatories and Requests for Production of Documents Propounded to Plaintiff* to the following counsel of record:

G. Todd Butler, MB #102907  
Mallory K. Bland, MB #105665  
4270 I-55 North  
Jackson, Mississippi 39211-6391  
Post Office Box 16114  
Jackson, Mississippi 39236-6114  
Email: [todd.butler@phelps.com](mailto:todd.butler@phelps.com)  
Email: [mallory.bland@phelps.com](mailto:mallory.bland@phelps.com)

/s/ Garret T. Estes

Garret T. Estes



VERIFICATION

STATE OF MISSISSIPPI

COUNTY OF Deoto

I, George W. Welch, after first being duly sworn, according to law, hereby make oath that I have read and understand the foregoing Supplemental responses to Interrogatories and that they are true and correct to the best of my knowledge, information and belief.

*George W. Welch*  
GEORGE WELCH

Sworn to and subscribed before me this 12<sup>th</sup> day of April, 2021.

*L. Quisha Gross*  
Notary Public

My commission expires: 5/6/24.

